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FILED
U.S. DISTRICT COURT
APR 25 2018

DISTRICT OF UTAH
BY: _____
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JONATHAN LUKE PAZ,

Defendant.

Case No.

FELONY INFORMATION

VIOLATIONS:

21 U.S.C. §846, CONSPIRACY TO
MANUFACTURE A CONTROLLED
SUBSTANCE;

21 U.S.C. §§ 331(k) & 333(b)(7),
KNOWING AND INTENTIONAL
ADULTERATION OF DRUGS WHILE
HELD FOR SALE

18 U.S.C. § 1956(h), CONSPIRACY TO
COMMIT MONEY LAUNDERING

Judge Dale A. Kimball

The United States Attorney charges:

COUNT 1

(21 U.S.C. §§ 846 & 841(a)(1), CONSPIRACY TO MANUFACTURE FENTANYL)

Beginning on a date unknown to the Grand Jury, but at least by February 3, 2016,
and continuing to at least November 22, 2016, in the Central Division of the District of
Utah and elsewhere,

Case: 2:18-cr-00231
Assigned To : Shelby, Robert J.
Assign. Date : 4/25/2018
Description: USA v. Paz

JONATHAN LUKE PAZ,

defendant herein, did combine, conspire, confederate and agree with AARON MICHAEL SHAMO and with other persons, both known and unknown, to knowingly and intentionally manufacture four hundred grams or more of a mixture or substance containing a detectable amount of Fentanyl (N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide), a Schedule II controlled substance within the meaning of 21 U.S.C. § 812, all in violation of 21 U.S.C. §§ 846 and 841(a)(1) and punishable under 21 U.S.C. § 841(b)(1)(A).

COUNT 2

(21 U.S.C. §§ 331(k) & 333(b)(7), KNOWING AND INTENTIONAL
ADULTERATION OF DRUGS WHILE HELD FOR SALE

Beginning on a date unknown, but at least by February 3, 2016, and continuing to at least November 22, 2016, in the Central Division of the District of Utah,

JONATHAN LUKE PAZ,

defendant herein, knowingly and intentionally manufactured a drug and caused the manufacture of a drug—specifically, round blue tablets debossed with “A 215” on the bisected side—and offered those tablets for sale on the internet as “Oxycodone 30 mg.” Despite these representations, the defendant did not use Oxycodone at all in the manufacturing process, but instead, substituted Fentanyl, a much more potent synthetic opioid. These acts caused the drug to be adulterated as defined at 21 U.S.C. §§ 351(b) and 351(d), and the adulteration had a reasonable probability of causing serious adverse health consequences or death to humans. The manufacturing of these drugs was


performed after the component ingredients of the tablets had been shipped in interstate commerce, from outside of Utah to Utah, and while the drugs were held for sale. All this was in violation of 21 U.S.C. §§ 331(k) and 333(b)(7) and is punishable pursuant to 21 U.S.C. § 333(b)(7).

COUNT 3

(21 U.S.C. §§ 331(k) & 333(b)(7), KNOWING AND INTENTIONAL
ADULTERATION OF DRUGS WHILE HELD FOR SALE)

Beginning on a date unknown, but at least by June 18, 2016, and continuing to at least November 22, 2016, in the Central Division of the District of Utah,

JONATHAN LUKE PAZ,

defendant herein, knowingly and intentionally manufactured a drug and caused the manufacture of a drug—specifically, round blue tablets with “” on one side and a “30” above a bisect on the other—and offered those tablets for sale on the internet as “Oxycodone 30 mg.” Despite these representations, the defendant did not use Oxycodone at all in the manufacturing process, but instead, substituted Fentanyl, a much more potent synthetic opioid. These acts caused the drug to be adulterated as defined at 21 U.S.C. §§ 351(b) and 351(d), and the adulteration had a reasonable probability of causing serious adverse health consequences or death to humans. The manufacturing of these drugs was performed after the component ingredients of the tablets had been shipped in interstate commerce, from outside of Utah to Utah, and while the drugs were held for sale. All this was in violation of 21 U.S.C. §§ 331(k) and 333(b)(7) and is punishable pursuant to 21 U.S.C. § 333(b)(7).

COUNT 4

(18 U.S.C. § 1956(h), CONSPIRACY TO COMMIT MONEY LAUNDERING)

Beginning on a date unknown to the Grand Jury, but at least by February 10, 2015, and continuing to at least November 22, 2016, in the Central Division of the District of Utah and elsewhere,

JONATHAN LUKE PAZ,

defendant herein, did knowingly combine, conspire, confederate and agree with other persons, both known and unknown to the Grand Jury, to knowingly conduct and attempt to conduct a financial transaction affecting interstate commerce, to wit, bank deposits, which involved the proceeds of a specified unlawful activity, that is, the manufacture and distribution of a controlled substance in violation of 21 U.S.C. § 841(a)(1), with the intent to promote, conceal, and disguise the carrying on of specified unlawful activity, that is, manufacture and distribution of a controlled substance, and that while conducting and attempting to conduct such financial transactions knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity in violation of 18 U.S.C. § 1956(a)(1)(A)(i) and (a)(1)(B)(i); all in violation of 18 U.S.C. §1956(h).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Pursuant to 21 U.S.C. § 853, upon conviction of any offense in violation of 21 U.S.C. §§ 841 and 846, as set forth in this Felony Information, the defendant shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or

intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses. The property to be forfeited includes, but is not limited to, the following:

CURRENCY

- \$1,227,773.00 in United States Currency
- \$19,520.00 in United States Currency
- \$429,600.00 in United States Currency
- \$5,357,950.38 in United States Currency, the proceeds of the sale of 513.15 Bitcoin

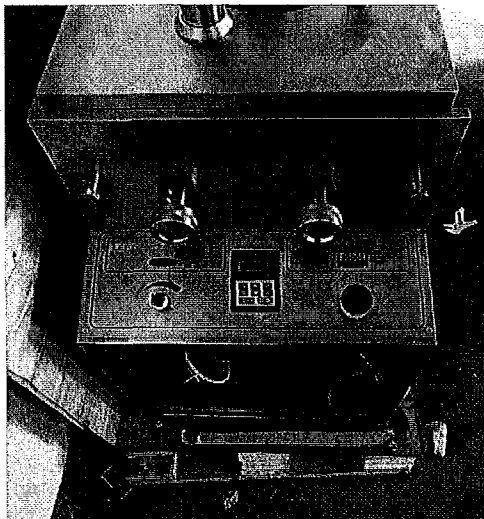
AUTOMOBILES

- A 2011 Ford F-350 pickup, VIN#1FT8W3BT7BEC88017
- A 2008 BMW 135i, VIN#WBAUC73508VF25535

MISCELLANEOUS

- The pill press seized from the garage at Aaron SHAMO's residence on Titian Way.

Here is a photo:



- The following dies/punches:

Item	Punch Embossing	Comparison Tablet(s) Available	Comparison Tablet(s) Items
Item 20 A1	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 20 A2	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 20 A3	(Slug – not a tablet punch)	NO	NOT APPLICABLE
Item 20 B1	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B2	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B3	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B4	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B5	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B6	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B7	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B8	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B9	10/325	NO	NOT AVAILABLE
Item 20 B10	X A N A X (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B11	2 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20 B12	M523	NO	NOT AVAILABLE
Item 20 B13	M523	NO	NOT AVAILABLE
Item 20 B14	M523	NO	NOT AVAILABLE
Item 20 B15	M523	NO	NOT AVAILABLE

Item 20 B16	M523	NO	NOT AVAILABLE
Item 20 B17	10/325	NO	NOT AVAILABLE
Item 20 B18	10/325	NO	NOT AVAILABLE
Item 20 B19	10/325	NO	NOT AVAILABLE
Item 20 B20	10/325	NO	NOT AVAILABLE
Item 20 B21	R 0 3 9 (w/ $\frac{3}{4}$ cores)	NO	NOT AVAILABLE
Item 20	10 metal die with oval shaped through holes	No Analyses Performed	No Analyses Performed
Item 21 A1	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A2	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A3	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A4	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A5	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A6	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A7	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A8	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 21 A9	M (enclosed in a square)	YES	6, 8, 9, 10, 12, 13
Item 22 A1	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A2	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A3	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19

Item 22 A4	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A5	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A6	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A7	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19
Item 22 A8	GG 2 4 9 (w/ $\frac{3}{4}$ cores)	YES	14, 15, 16, 17, 18, 19

MONEY JUDGMENT

- A MONEY JUDGMENT in the amount of \$981,000 (the value of 200 Bitcoins on 9/13/2017), which sum represents the minimum value of any proceeds obtained, directly or indirectly, as the result of such offenses and the value of any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the offenses.

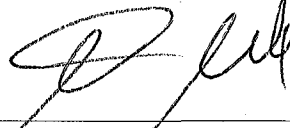
SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

JOHN W. HUBER
United States Attorney

A handwritten signature in black ink, appearing to read 'M. Gadd', is written over a horizontal line.

MICHAEL GADD
Special Assistant United States Attorney